

REMARKS**I. General**

Claims 1-24 are pending, and all rejected by the current Office Action. No claims are amended by this response. The issues in the Office Action are as follows:

- The Specification is objected to for use of the term, “N-to-one,” instead of “one-to-N.”
- Claims 1-24 are rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent 5,305,311 (hereinafter, *Lyles*) in view of U.S. Patent 6,487,171 (hereinafter, *Honig*).

Applicants hereby traverse the outstanding rejections and request reconsideration and withdrawal in light of the remarks contained herein.

II. Objection to the Specification

On page 2 of the Office Action, the Specification is objected to for use of the term, “N-to-one.” The Specification has been amended to recite, “one-to-N,” according to the Examiner’s request. The Applicants have also changed “six-to-one” to “one-to-six.” Because these amendments correct obvious errors, no new matter is added. Withdrawal of the objection is respectfully requested.

III. Claim Rejections

Claims 1-24 are rejected under 35 U.S.C. §103(a) as being obvious over *Lyles* in view of *Honig*.

To establish a prima facie case of obviousness under 35 U.S.C. § 103(a), three basic criteria must be met. First, there must be some suggestion or motivation, either in the reference itself or in the knowledge generally available to one of ordinary skill in the art, to modify the applied reference. Second, there must be a reasonable expectation of success. Finally, the applied reference must teach or suggest all the claim limitations. See M.P.E.P. § 2143. Without conceding any other criteria, Applicants respectfully assert that the rejection

does not satisfy the third criterion, as discussed further below.

A. Claims 1-5

Claim 1 recites, in part, “a dedicated multicast output card,” and “a dedicated multicast input card.” The cited combination does not teach or suggest the above-recited features of claim 1. The Office Action, at page 3, cites *Lyles* at Col. 4, line 58-Col. 5, line 2 and item 48 of FIGURE 2 as teaching “a dedicated multicast output card” and “a dedicated multicast input card;” however, *Lyles* fails to teach or suggest those features of claim 1. The cited passage describes that multicast cells are routed to a copy network, which is depicted as item 48 in FIGURE 2. The copy network is not a dedicated multicast input or output card, but rather, is part of a card that contains logic for unicast cells too. See Col. 12, line 62 through Col. 13, line 3:

Another advantage of the copy network 48 is that it is consistent with using the natural system packaging because it can be implemented using two types of boards; the switching fabric 41 and N/p identical line cards, each with the complete logic for p lines. As shown in FIG. 2, the line card logic includes (for its p lines) the input and output links 84 and 85, respectively, the VCI translation circuits 53, the reservation ring evaluators (see FIGS. 8 and 9), all of input and output buffering, and a p times p crossbar 86.

According to the quoted passage, the switch in *Lyles* uses only one type of line card, which contains complete logic for the lines. For instance, input links 84 are also included in the p identical cards, and those links handle unicast cells and multicast cells. Thus, each of the p identical line cards handles both unicast and multicast cells and, accordingly, is not a “dedicated multicast” card. Therefore, *Lyles* does not teach or suggest “a dedicated multicast output card” or “a dedicated multicast input card,” as claim 1 requires.

The Office Action does not rely on *Honig* to supply the above-recited features of claim 1. Therefore, the cited combination of *Lyles* and *Honig* does not teach or suggest each and every feature of claim 1. Accordingly, Applicants respectfully request removal of the 35 U.S.C. §103(a) rejection of claim 1.

Dependent claims 2-5 each depend either directly or indirectly from independent claim 1 and, thus, inherit all of the limitations of independent claim 1. Thus, the combination of *Lyles* and *Honig* does not teach or suggest all claim limitations of claims 2-5. It is respectfully submitted that dependent claims 2-5 are allowable at least because of their dependence from claim 1 for the reasons discussed above.

B. Claims 6-24

Claim 6 recites, in part, “a dedicated multicast output card,” and “a dedicated multicast input card.” The combination of *Lyles* and *Honig* does not teach or suggest the above-recited features of claim 6. While the Office Action cites the copy network (item 48 of FIGURE 2) as teaching dedicated multicast cards, such assertion is incorrect. See Col. 12, line 62 through Col. 13, line 3 of *Lyles*, which states that the disclosed switch uses only one type of line card, which contains complete logic for the lines. For instance, input links 84 are also included in the *p* identical cards, and those links handle unicast and multicast cells. Thus, each of the *p* identical line cards handles both unicast and multicast cells and, accordingly, is not a “dedicated multicast” card, as claim 6 requires.

The Office Action does not rely on *Honig* to supply the above-recited features of claim 6. Therefore, the cited combination of *Lyles* and *Honig* does not teach or suggest each and every feature of claim 6. Accordingly, Applicants respectfully request removal of the 35 U.S.C. §103(a) rejection of claim 6.

Dependent claims 7-24 each depend either directly or indirectly from independent claim 6 and, thus, inherit all of the limitations of independent claim 6. Thus, the combination of *Lyles* and *Honig* does not teach or suggest all claim limitations of claims 7-24. It is respectfully submitted that dependent claims 7-24 are allowable at least because of their dependence from claim 6 for the reasons discussed above.

IV. Conclusion

In view of the above, each of the presently pending claims in this application is believed to be in immediate condition for allowance. Accordingly, the Examiner is respectfully requested to pass this application to issue.

Application No.: 09/714,426

Docket No.: 59182/P005US/10020642

Our check in the amount of \$55.00 to cover the one month extension of time fee is enclosed. However, if any additional fee is due, please charge our Deposit Account No. 06-2380, under Order No. 59182/P005US/10020642 from which the undersigned is authorized to draw.

Dated: July 13, 2004

I hereby certify that this correspondence is being deposited with the U.S. Postal Service as Express Mail, Airbill No. EV482735174US, in an envelope addressed to: MS Amendment, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450, on the date shown below.

Dated: July 13, 2004

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Respectfully submitted,

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